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OFFICE OF THE
EXECUTIVE SECRETARY

July 13, 1999

VIA OVERNIGHT MAIL

Mr. David Waddell, Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37219

Re: Intellicall Operator Services, Inc. ("IOS")

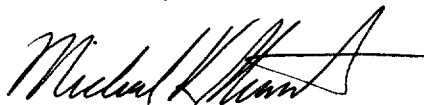
99-00493

Dear Mr. Waddell:

Enclosed please find the original and fourteen (14) copies of IOS' Amended IntraLATA Toll Dialing Parity Plan ("Amended Plan"), which amends the IntraLATA Toll Dialing Parity Plan originally submitted by IOS on June 28, 1999.

Please file the Amended Plan in your usual fashion and return one (1) file-stamped copy to us in the enclosed envelope.

Sincerely,



Michael K. Stewart

Enc.

cc: B. Reid Presson, Jr.
Intellicall Operator Services, Inc.
(with enclosure)
Charles A. Hudak, Esq.
(without enclosure)
Bradley S. Macdonald, Esq.
(without enclosure)

INTELLICALL OPERATOR SERVICES, INC. d/b/a ILD

AMENDED INTRALATA TOLL DIALING PARITY PLAN

I. INTRODUCTION

Pursuant to regulations promulgated by the Federal Communications Commission ("FCC"),¹ Intellicall Operator Services, Inc. d/b/a ILD ("IOS") intends to implement technologies which will provide end user customers ("Customer(s)") with the opportunity to designate a carrier for their intraLATA toll traffic. Once the Customer has made such a designation, intraLATA toll calls will automatically be directed to the designated carrier without additional action on the part of the Customer (*e.g.*, without requiring the Customer to dial an access code); in addition, Customers will continue to have the option to utilize additional intraLATA toll carriers on a call-by-call basis by dialing access codes. IOS proposes to implement such toll dialing parity on or before the earlier of (i) thirty (30) days following the date this Amended Toll Dialing Parity Plan ("Plan") is approved by the Tennessee Regulatory Authority ("TRA") or (ii) July 22, 1999, unless the TRA requires otherwise. This Plan will be implemented throughout all exchanges in Tennessee. IOS intends to offer its services in all LATAs in Tennessee.

II. METHODOLOGY

IOS will utilize "multiple Primary Interexchange Carrier ('PIC') technology to implement intraLATA toll dialing parity. Multiple-PIC technology will allow Customers the capability to presubscribe to the same or different carriers for their intraLATA toll and interLATA service. In addition, IOS will offer Customers the ability to access all participating carriers (who have established themselves as access customers under applicable IOS tariffs) by dialing the appropriate

¹47 C.F.R. §51.213(a) (requiring that each local exchange carrier offering exchange service in a state file a plan for providing intraLATA toll dialing parity within the state). *See also* In the Matters of Implementation of the Local Competition Provisions of the Telecommunications Act of 1996 *et al.*, FCC 99-54, CC Docket 96-98 (Order adopted March 19, 1999, released March 23, 1999).

access code (*i.e.*, 10XXX, 101XXXX) when placing individual toll calls. Any tariff affected by this Plan will be revised where appropriate, and such revisions will be filed with all applicable regulatory authorities.

IOS does not intend to recover the costs associated with implementing the Plan.

III. CARRIER INFORMATION

Carriers will have the option of (i) offering intraLATA toll service only or offering intraLATA toll and interLATA service and (ii) participating in all market areas or only in specific market areas. IOS will notify potential carriers prior to the initial availability of presubscription in a particular market area.

A carrier will be required to return a completed Non-Disclosure and Participation Agreement, which will be provided to individual carriers as part of the IOS correspondence process. Carriers wishing to participate will be requested to submit Access Service Requests/Translation Questionnaires to the Access Tandem owner (*i.e.*, the incumbent local exchange carrier (“ILEC”)) and to IOS.

IOS will not participate in billing disputes between the Customer and the alternative carrier arising out of or related to the provision of intraLATA toll services.

IV. NETWORK INFORMATION

All originating intraLATA toll traffic will initially be routed via the ILEC Access Tandem. Each participating carrier must have Feature Group “D” trunks in place (or ordered) between its point of presence and the ILEC Access Tandem(s).

IOS will route all originating intraLATA toll traffic to the designated carrier and will only block traffic at the request of the Customer and/or in compliance with applicable law and regulations. IOS will not honor requests from carriers to block traffic or to remove Customers from

the carrier's network. Calls that cannot be completed to a carrier will be routed to a recorded announcement.

V. CUSTOMER CONTACT INFORMATION

IOS' customer contact representatives will process Customer-initiated PIC selections to IOS or to an alternative intraLATA toll carrier as designated by the Customer. In addition, alternative carriers may submit PIC changes to IOS via a fax/paper interface; in this event, carriers will be required to submit PIC changes using the Customer Account Record Exchange ("CARE") 960-byte format via paper medium. IOS will provide carriers with PIC order confirmation and reject information using the CARE format. Specific details regarding CARE will be provided to participating carriers.

IOS will not automatically assign a PIC selection (for itself or any other carrier) to any existing Customer without receipt of that Customer's written consent. Should written IOS correspondence to an existing Customer go unanswered, no PIC change will be made. IOS will accept a selection of "NO PIC" as a bona-fide PIC selection; "NO PIC" Customers will have access code dialing capability to reach participating intraLATA toll carriers.

IOS will inform new Customers of their right to choose an intraLATA toll carrier, and will process Customer-initiated PIC selections to IOS or to an alternative intraLATA toll carrier as designated by the Customer. In the event that a new Customer is unable or unwilling to select an intraLATA toll carrier, IOS will enter a PIC selection of "NO PIC" for such Customer, and will advise such Customer that he or she will have access code dialing capability to reach participating intraLATA toll carriers. IOS will provide all Customers with a confirmation notification of their PIC selection.

Upon Customer request, IOS' representatives will provide alternative carrier names (and, if

supplied by the alternative carrier, telephone numbers) to new or existing Customers in random, competitively neutral order. However, IOS' representatives will not discuss alternative carrier rates or services with Customers, nor will they provide Customers with Carrier Identification Codes or access dialing instructions. IOS' representatives will not initiate or accept three-way calls from alternative carriers to discuss presubscription.

VI. COMPLIANCE WITH LAWS/ ANTI-SLAMMING PROCEDURES

IOS will provide nondiscriminatory access to telephone numbers, operator services, directory assistance and directory listings in all areas served. IOS will comply with all rules promulgated by the FCC and TRA, including the TRA's anti-slamming rules. IOS' procedures to protect consumers against slamming will conform to the requirements of TRA Rule 1220 4-2-.56.

VII. PRESUBSCRIPTION INFORMATION

A five dollar (\$5.00) PIC Change Charge will be incurred and billed to the Customer for each eligible line where a PIC change is made. However, IOS intends to provide Customers with a thirty (30) day PIC Change Charge waiver period. Beginning one hundred and eighty (180) days after the implementation of this Plan, IOS will offer intraLATA PIC Freeze service to all Customers at no charge, in an effort to reduce unauthorized PIC changes. PIC Freeze can only be initiated or removed by the Customer's verbal or written request.

For Customers who change their local service provider from another local exchange carrier ("Other LEC") but retain the telephone number assigned by the Other LEC, IOS, as part of the CARE PIC process, will provide the designated intraLATA carrier with both the retained Other LEC telephone number and the IOS-assigned telephone number.

Dated July 13, 1999.

INTELLICALL OPERATOR SERVICES, INC.
d/b/a ILD

By: B. Reid Presson, Jr.
Regulatory Consultant

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